

John P. Sheridan
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ILA Local 1804-1, ILA Local 1233, and ILA Local 1235*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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INTERNATIONAL UNION OF OPERATING	:	
ENGINEERS, LOCAL 825,	:	
	:	
Plaintiff,	:	
	:	
v.	:	MOTION DAY
	:	SEPTEMBER 5, 2023
	:	
INTERNATIONAL LONGSHOREMEN'S	:	
ASSOCIATION, INTERNATIONAL	:	Civil Action No.
LONGSHOREMEN'S ASSOCIATION LOCAL 1233,	:	2:23-cv-03689
INTERNATIONAL LONGSHOREMEN'S	:	
ASSOCIATION 1235, and INTERNATIONAL	:	
LONGSHOREMEN'S ASSOCIATION LOCAL 1804-1,	:	
	:	
Defendants.	:	
	:	
-----X		

**CERTIFICATION OF JOHN P. SHERIDAN
IN SUPPORT OF THE ILA DEFENDANT'S MOTION TO DISMISS**

I, JOHN P. SHERIDAN, hereby certify as follows:

1. I am an attorney at law of the State of New Jersey and am a member of the law firm of Mazzola Mardon, P.C. We represent Defendants International Longshoremen's

Association, ILA Local 1804-1, ILA Local 1233, and ILA Local 1235 (collectively, ILA Defendants) in the above-captioned action. I make this certification to place before the Court a document relevant to the Defendants' Motion to Dismiss Plaintiff's Amended Complaint pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

2. Attached hereto as Exhibit A is a true and accurate copy of a document entitled "Letter of Understanding," dated February 1, 2023, which I received by email on July 26, 2023 from a third party who is not named in this action. I am informed and believe that Exhibit A is the same "letter of understanding" that Plaintiff refers to on multiple occasions in its Amended Complaint.

I hereby certify that the foregoing statements are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ John P. Sheridan
John P. Sheridan

Dated: August 30, 2023

CERTIFICATE OF SERVICE

I hereby certify that on the 30th Day of August, 2023, a copy of this Notice of Motion was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/John P. Sheridan

John P. Sheridan